

1 JAMES L. DAY (WSBA #20474)  
2 CHRISTINE M. TOBIN-PRESSER  
(WSBA #27628)  
3 JASON WAX (WSBA #41944)  
BUSH KORNFELD LLP  
4 601 UNION STREET, SUITE 5000  
SEATTLE, WA 98101  
Tel (206) 292-2110  
5 Emails: [jday@bskd.com](mailto:jday@bskd.com),  
[ctobin@bskd.com](mailto:ctobin@bskd.com), [jwax@bskd.com](mailto:jwax@bskd.com)

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UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WASHINGTON

In re

1 MIN, LLC; HOTEL AT SOUTHPORT,  
LLC; and TWELFTH FLOOR, LLC,

Debtors.

Chapter 11

Lead Case No. 24-01519

13 LAN CAI, et al.,

14 Plaintiffs,

15 v.

16 HOTEL AT SOUTHPORT, LLC, et al.,

17 Defendants,

18 and

19 WF CREL 2020 GRANTOR TRUST,

20 Intervenor-Defendant.

Adv. Proc. No. 25-80007

**NOTICE OF DEPOSITION**

21 TO: DAHE ZHANG

22 AND TO: Matthew Livingston, Matthew Sava, and Jeremy Roller, their Attorneys

23  
NOTICE OF DEPOSITION – Page 1

BUSH KORNFELD LLP  
LAW OFFICES  
601 Union St., Suite 5000  
Seattle, Washington 98101-2373  
Telephone (206) 292-2110  
Facsimile (206) 292-2104

1                   YOU AND EACH OF YOU WILL PLEASE TAKE NOTICE that the testimony  
2 of DAHE ZHANG will be taken upon Oral Examination at the instance and request of  
3 Defendants 1 Min, LLC; Hotel at Southport, LLC; Twelfth Floor, LLC; and Intervenor-  
4 Defendant WF CREL 2020 Grantor Trust, on May 12, 2025, commencing in the above-  
5 entitled action.

6                   The deposition will be conducted at the following date, time and location:

7                   **Deponent: DAHE ZHANG**

8                   **Location: Seattle, Washington (exact location TBD)**

9                   **Date: May 12, 2025**

10                   **Time: 9:00 a.m. Pacific Time until excused (or at another time on May 12,  
11 2025 agreed to by Defendants, Intervenor-Defendants, and counsel for  
12 the Deponent)**

13                   This deposition will be taken by stenographic and audiovisual means before an  
14 official authorized to administer oaths. The deposition is subject to continuance or  
15 adjournment from time to time until completed, and the scope of the deposition will  
16 include but not be limited to all matters related to the deponent's claims against the  
17 Defendants and Intervenor-Defendant in the above-entitled proceedings.

18                   DATED this 8<sup>th</sup> day of April, 2025.

19                   BUSH KORNFELD LLP

20                   By /s/ Jason Wax

21                   James L. Day, WSBA #20474

22                   Christine M. Tobin-Presser #27628

23                   Jason Wax, WSBA #41944

                         Attorneys for the Reorganized Debtors

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BUSH KORNFELD LLP  
LAW OFFICES  
601 Union St., Suite 5000  
Seattle, Washington 98101-2373  
Telephone (206) 292-2110  
Facsimile (206) 292-2104